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**MEMO ENDORSED**

March 20, 2008

**VIA FEDEX**

Honorable Denise Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1040  
New York, New York 10007

USDC SDNY  
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Re: Gangadeen, et al. v. The City of New York, et al., 07 Civ. 10965 (DC)

Dear Judge Cote:

I represent the plaintiffs in the above-referenced action and write to request leave from the Court to file and serve a Second Amended Complaint, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. The defendants recently served an Answer to plaintiffs' Amended Complaint on March 13, 2008. On March 14, 2008, I learned that defendants unlawfully terminated Akindra Reape, a plaintiff in this case, in direct retaliation for initiating this lawsuit. As the issue was just joined last week, defendants would, in no way, be prejudiced should plaintiffs be allowed to amend their Complaint.

Accordingly, I respectfully request leave from the Court to file a Second Amended Complaint to add a cause of action for unlawful retaliation on behalf of my client, Akindra Reape.

Respectfully submitted,

*Walker G. Harman, Jr.*

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Cc: Isaac Klepfish, Esq.

*The Court having received  
no objection, plaintiff may  
file the 2d Amended  
Complaint.*  
*Denise Cote*  
*March 25, 2008*